

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed April 22, 2008. At the time of the Office Action, Claims 15-28 were pending in this Application. Claims 15-18 and 24-28 were rejected, and Claims 19-23 were objected to. Claims 29-34 have been added. Applicant respectfully requests reconsideration and favorable action in this case.

Claim Objections

Claims 19-23 were objected to as being in improper form because they depend on cancelled Claims 1 and 5. Applicant amends Claims 19-23 to overcome these objections.

Rejections under 35 U.S.C. § 102

Claims 15-18 and 24-28 were rejected by the Examiner under 35 U.S.C. §102(e) as being anticipated by U.S. Patent 6,839,570 issued to Hutchison IV ("Hutchison"). Applicant respectfully traverse and submits the cited art does not teach all of the elements of the claimed embodiment of the invention.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Furthermore, "the identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co. Ltd.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Applicant respectfully submits that the cited art as anticipated by the Examiner cannot anticipate the rejected Claims, because the cited art does not show all the elements of the present Claims.

The independent claim 15 includes the limitation "*a bidirectional data line that connects a card data input/output of the SIM card to a modem data input/output of the GSM modem.*" The Examiner stated that *Hutchinson* discloses this limitation in particular in Fig. 2 A. Applicant respectfully disagrees. According to this limitation the bidirectional line connects to a modem data input/output of the GSM modem. However, *Hutchinson* discloses a different arrangement in which a GSM modem does not comprise a bidirectional

input/output. instead, *Hutchinson* discloses a modem that uses separate transmit and receive terminals TX and RX. See, *Hutchinson*, FIG. 2A and associated description. Moreover, because the TX output is driven actively by the modem it cannot be directly connected to the bidirectional line 212. See, *Hutchinson*, col. 7, line 9-13. hence, the Bus I/F 214 disclosed by *Hutchinson* is a converting circuit that converts the signals generated by the TX output port into an open drain configuration. However, such a conversion circuit is not an edge driver as claimed. the edge driver as claimed is capable of supporting the bi-directional input/output terminals of the modem and/or SIM card. *Hutchinson* neither discloses or suggests such a driver.

Hence, Applicant believes that all pending claims are allowable in view of the cited prior art. Applicant respectfully submits that the dependent Claims are allowable at least to the extent of the independent Claim to which they refer, respectively. Thus, Applicant respectfully requests reconsideration and allowance of the dependent Claims. Applicant reserves the right to make further arguments regarding the Examiner's rejections under 35 U.S.C. §103(a), if necessary, and do not concede that the Examiner's proposed combinations are proper.

Association of Customer Number and Change of Correspondence Address

Applicant respectfully requests that all papers pertaining to the above-captioned patent application be associated with Customer No. **31625**, and direct all correspondence pertaining to this patent application to practitioners at Customer Number **31625**. All telephone calls should be directed to Andreas Grubert at 512.322.2545. A Revocation and POA will be filed shortly.

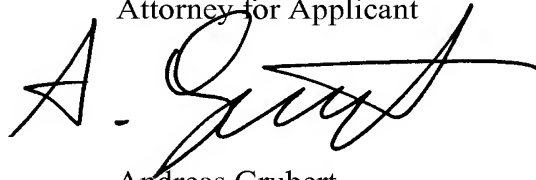
CONCLUSION

Applicant has made an earnest effort to place this case in condition for allowance in light of the remarks set forth above. Applicant respectfully requests reconsideration of the pending claims.

Applicant believes there are no fees due at this time, however, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 50-2148 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicant's attorney at 512.322.2545.

Respectfully submitted,
BAKER BOTTS L.L.P.
Attorney for Applicant

A handwritten signature in black ink, appearing to read 'A. Grubert', is written over the typed name and title.

Andreas Grubert
Registration No. 59,143

Date: July 22, 2008

SEND CORRESPONDENCE TO:

BAKER BOTTS L.L.P.

CUSTOMER ACCOUNT NO. **31625**

512.322.2545

512.322.8383 (fax)